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Before the

FM EXAMEL 3

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C.

In the matter of:

POSITIVE ALTERNATIVE RADIO, INC.

New FM, Asheboro, North Carolina Seeking: 89.3 MHz, 2.5 kW, 120 M

To the Chief, FM Branch

Informal Objection

We must informally object to the application by Positive Alternative Radio (PAR) for facilities in Asheboro, North Carolina (BPED-911119MC).

Radio stations WXYC, WSOE, and WCPE have been engaged in cooperative frequency coordination efforts designed to increase the signal quality that each individual service is able to deliver to its listeners, from the standpoints of both efficient use of the spectrum and serving of the public interest. The public benefit of cooperative coordination has been well demonstrated by both WCPE and WCCE (Buies Creek, North Carolina).

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Whereas WXYC, WSOE, and WCPE (and in the past, WCCE) have agreed to work together (and offer each other reciprocal considerations) for the overall public benefit, PAR stands alone and independent. Additionally, there exists the North Carolina Public Radio Association (NCPRA), a non-profit Corporation, one Corporate purpose of which is "The coordination of technical information regarding radio spectrum use." WXYC, WSOE, WCCE, and WCPE have been directly or indirectly involved with NCPRA, but PAR has not.

We request that the PAR application not be granted, not only because we believe that a detailed technical study must be made of the actual radiation pattern of the proposed transmitting system, but moreover, because PAR has not worked with the local non-commercial radio community in pursuing an efficient and mutually beneficial frequency allocation strategy that benefits all North Carolina public radio stations and their listeners. We believe these goals are attainable, but only if PAR, WXYC, WSOE, and WCPE work together as a unit.

Finally, we question whether PAR has the financial ability to operate the several stations that it has cumulatively proposed to finance, construct, and then operate; we suggest to the Commission that a financial evaluation be made of PAR's current resources.

Therefore, we must request that the PAR Asheboro application BPED-911119MC be denied at this time.

Respectfully submitted

Don Grady

David Wright

CERTIFICATE OF SERVICE

	I, <u>David C. Wright</u> do hereby certify that copies of the foregoing "INFORMAL PETITION TO DENY" were sent this <u>ZL</u> nd day of <u>December. 1992 via First Class Mail, postage prepaid, to the </u>
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